



State of Ohio Environmental Protection Agency

4587

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FILE: 2002-5-10-116
D-0167
Bob Taft, Governor
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Christopher Jones, Director

November 1, 2001
2002 MA

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Re: COMMENTS - Implementation Plan for Area 6 Solid Waste Landfill and Fire Training Facility

Dear Mr. Reising:

Ohio EPA has reviewed DOE's submittal, "Implementation Plan For Area 6 Solid Waste Landfill And Fire Training Facility" (20600-PL-003) Rev. A Draft received on September 4, 2002. Attached are our comments on the document.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FF
Mark Shupe, HSI GeoTrans
Michelle Cullerton, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

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**IMPLEMENTATION PLAN FOR AREA 6 SOLID WASTE LANDFILL
AND FIRE TRAINING FACILITY**

Comments:

1. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: General Comment Pg #: n/a Line #: n/a Code: C

Original Comment #:

Comment: Biohazard materials, such as bioassay samples, were determined to be included in the Solid Waste Landfill wastes. Please explain how wastes will be handled.

Response:

Action

2. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: General Comment Pg #: n/a Line #: n/a Code: C

Original Comment #:

Comment: Please provide cross sections of the SWL and the FTF to include the boring locations and the data verifying contamination boundaries lie within the proposed excavation footprint.

Response:

Action

3. Commenting Organization: Ohio EPA Commentor: DSW

Section #: Executive Summary Pg #: ES-1 to ES-2 Line #: 33-36 and 2-3 Code: C

Original Comment #:

Comment: The primary constituents of concern do not include technetium-99 and tetrachloroethene which are listed as above WAC materials present. Shouldn't these also be constituents of concern?

Response:

Action:

4. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 1.3.2 Pg #: 1-4 Line #: 33-34 Code: C

Original Comment #:

Comment: The text states that the specifications and drawings for this IRDP "builds upon 3A4A's excavation designs." Ohio EPA would expect that any specifications that follow 3A/4A design would have been emended to fit the excavation design for Area 6. If not, those corrections must be made.

Response:

Action:

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5. Commenting Organization: Ohio EPA Commentor: DSW

Section #: 1.5 Pg #: 1-10 and 1-13 Line #: 35 and 5 Code: C

Original Comment #:

Comment: It is not necessary, nor in all cases desired, to "restore positive drainage" as evidenced by removal actions in areas such as the Southern Waste Units. Please delete the reference or replace with post remedial grading will be consistent with the goals of the Natural Resource Restoration Plan.

Response:

Action:

6. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: Figure 2-3 Pg #: Line #: na Code: C

Original Comment #:

Comment: Was a confirmatory soil sample or HPGe scan taken at the highest NaI value of 393.19 ppm during the Solid Waste Landfill WAC surface scan? If so, please provide the results of the sampling or scan.

Response:

Action:

7. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3.3.2.3 Pg #: 3-6 Line #: 26 Code: C

Original Comment #:

Comment: Grammatical error on Line 26.

Response:

Action:

8. Commenting Organization: Ohio EPA Commentor: DSW

Section #: 4.1.5 Pg #: 4-3 Line #: 13-14 Code: C

Original Comment #:

Comment: This section states that since these areas are relatively small, a SWMP will not be written for these activities. Although small in area, these activities need to have the detail provided in a SWMP and should have one written for this plan. Although small in area, these excavations have the potential for releasing significant contaminant loads to the aquifer (the building 6 basement is an example of a small area with potential for release of significant contaminant loads to the aquifer). A plan should be prepared to demonstrate how contaminated excavation water will be handled, sampling for voc's and disposition, how quickly water will be removed and where it will go, run on and run off controls, controls for the laydown areas and stockpiles, etc.

Response:

Action:

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9. Commenting Organization: Ohio EPA Commentor: DSW

Section #: 4.1.5.1 Pg #: 4-3 Line #: 22-27 Code: C

Original Comment #:

Comment: The water should not be pumped to the SWRB if VOC's are present. Please include a plan of how to deal with VOC contaminated water. Please include drawings showing the catch basins, dewatering lines, and culverts (including those to be plugged and those to be installed).

Response:

Action:

10. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 4.1.5.2 Pg #: 4-4 Line #: 2-8 Code: C

Original Comment #:

Comment: This section explains that excavation water containing VOCs in excess of 50 ug/L will be tanked and transported to the AWWT for Phase II treatment.

A) Will the 50 ug/L limits be detected by using the GC unit?

B) How many truckloads will it take to manage the above concentrations?

Response:

Action:

11. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 4.3/General Pg #: Line #: Code: C

Original Comment #:

Comment: DOE must provide an explanation of why the only listed wasted resulting from the FTF excavation are Stockpiles FTF-003 and FTF-004. Additional discussion on the generation of the piles and the listed aspects of the FTF HWMU is needed. Include how the current solvent contamination levels affect the listed status of remaining soils and how they relate to above WAC soils.

Response:

Action:

12. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 4.3.1 Pg #: 4-5 Line #: 25-27 Code: C

Original Comment #:

Comment: How is the material covered and contained or Stockpile AR6-003? What future treatment will be used for the above WAC organic constituents?

Response:

Action:

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13. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.3.3.1 Pg. #: 4-8 Line #: 12-19 Code: C

Original Comment #:

Comment: This paragraph needs clarification. It is understandable that the SWL contains more debris and less concrete and metal however, there is no mention of where the waste will be disposed or how it will be removed. Additionally, what measures will be taken to prevent nuisance odors and disease vectors when the material is stockpiled waiting for disposal.

Response:

Action:

14. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.3.3 Pg. #: 4-8 Line #: 1-4 Code: C

Original Comment #:

Comment: The criteria listed in the two bullets for interim and temporary slopes are too steep and unacceptable to Ohio EPA. The correct criteria is outlined in the Technical Specifications for this implementation plan and included in DOE's 3A/4A Implementation Plan.

Response:

Action:

15. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 4.4.1 Pg #: 4-9 to 4-10 Line #: NA Code: C

Original Comment #:

Comment: This section should be included in the SWMP.

Response:

Action:

16. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.4.1 Pg #: 4-10 Line #: 10 Code: C

Original Comment #:

Comment: Explain the meaning of a 72-hour dewatering requirement.

Response:

Action:

17. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.6 Pg. #: 4-13 Line #: 2-21 Code: C

Original Comment #:

Comment: This document should include detail on post-remediation grading and topography as well as interim restoration activities. It is unacceptable to leave these areas unstabilized until such time as final restoration plans are developed. This issue has been

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revisited in the past and acceptable criteria have been established. Please refer to Section 3.6 in DOE's 3A/4A Implementation Plan 20800-PL-0002 Rev 0 Final dated May 2001.

Response:

Action:

18. Commenting Organization: Ohio EPA Commentor: DSW

Section #: 7.1.4.2 Pg #: 7-10 Line #: 33-39 Code: C

Original Comment #:

Comment: Excavation water will also need to be sampled per section 4.4.1.

Response:

Action:

19. Commenting Organization: Ohio EPA Commentor: DSW

Section #: Drawing 99X-5500-G-00728 Pg #: NA Line #: NA Code: C

Original Comment #:

Comment: Inlet protection (Keyed note 3) should be installed per Rainwater and Land Development. Straw bales are not acceptable. Silt fence should be installed along contours (Keyed note H) per Rainwater and Land Development, not across contours.

Response:

Action:

20. Commenting Organization: Ohio EPA Commentor: DSW

Section #: Drawing 99X-5500-G-00730 Pg #: NA Line #: NA Code: C

Original Comment #:

Comment: General note 15 should read that excavation water should be handled in accordance with section 4.4.1 of the implementation plan. Silt fence should be installed along contours (Keyed note H) per Rainwater and Land Development, not across contours. It appears that construction of diversion berm (Keyed note G) should be finished before excavation begins to prevent run on into the excavation.

Response:

Action:

21. Commenting Organization: Ohio EPA Commentor: DSW

Section #: Drawing 99X-5500-G-00738 Pg #: NA Line #: NA Code: C

Original Comment #:

Comment: Inlet protection and silt fence installation detail should be consistent with Rainwater and Land Development.

Response:

Action:

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22. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Appendix A/Design Criteria Package Pg. #: Line #: Code: C
Comment: In reviewing the Design Criteria Package, several technical specifications and some language from 3A/4A DCP may or may not be appropriate. The language in the text and the specifications should be emended for the SWL and the FTF, then applied.
Response:
Action:

**TECHNICAL SPECIFICATIONS FOR SOIL
AND DISPOSAL FACILITY PROJECT
SOIL EXCAVATION PROJECTS**

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.1/02205 Pg. #: 6 Line #: R Code: C
Original Comment #:
Comment: In the event of a possible archeological find during an excavation, not only is the Construction Manager notified, but isn't someone from Cultural Resources contacted?
Response:
Action:

2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.1/02205 Pg. #: 6 Line #: S & T Code: C
Original Comment #:
Comment: During an excavation when special materials are discovered or a solvent, isn't WAO involved in assessing this type of material and determining disposal?
Response:
Action:

3. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.4/02205 Pg. #: 8 Line #: C Code: C
Original Comment #:
Comment: If SP-7 is full, will above-WAC material be taken to the WP's?
Response:
Action:

4. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.5/02205 Pg. #: 9 Line #: C Code: C
Original Comment #:
Comment: If RCRA material is an issue and treatment is warranted, where will the material be staged for or until treatment? How will the storage of the material comply with RCRA

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regulations?

Response:

Action:

5. Commenting Organization: Ohio EPA
Section #: 3.1/02207 Pg. #: 3

Commentor: OFFO
Line #: Code: C

Original Comment #:

Comment: Within this section under "General", shouldn't "A" from Section 3.1/02207 in the Specifications for 3A/4A be included?

Response:

Action: